

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MICHAEL SHERMAN, )  
Plaintiff, )  
VISION LAB TELECOMMUNICATIONS, )  
INC., ON DEMAND MARKETING LLC, )  
RANDY THOMASON, HIGHLAND )  
MARKETING LLC, BELLSOUTH )  
CORPORATION, TELEDATA SOLUTIONS, )  
INC., and THE SUPPORT GROUP IN SWEDEN, )  
AB, )  
Defendants. )  
Case No. 05-11545-NG

**DEFENDANT VISION LAB'S RULE 12(e) MOTION FOR A MORE DEFINITE STATEMENT**

Defendant Vision Lab Telecommunications, Inc. ("Vision Lab") respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 12(e), to compel plaintiff to file a more definite statement to permit Vision Lab to frame a proper responsive pleading that will advance the resolution of this case. As detailed in Vision Lab's accompanying Memorandum of Law, Vision Lab's Motion For A More Definite Statement should be granted because the Amended Complaint fails to place Vision Lab on proper notice of the conduct for which it is being sued and the legal bases of Plaintiff's putative claims for relief.

WHEREFORE, Vision Lab respectfully requests that this honorable Court grant its Motion For A More Definite Statement.

Dated: August 24, 2005

VISION LAB TELECOMMUNICATIONS, INC.,

By its attorneys,

*Richard M. Zielinski*  
Richard M. Zielinski (BBO #540060)  
GOULSTON & STORRS, P.C.  
400 Atlantic Avenue  
Boston, MA 02110-3333  
(617) 482-1776

Of Counsel:  
Samuel S. Cohen  
Neal Gerber Eisenberg LLC  
2 North LaSalle Street  
Suite 2200  
Chicago, IL 60602